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April 15, 2022

Hon. Stewart Aaron  
United States Magistrate Judge  
United States District Court  
500 North Pearl Street, Room 2260  
New York, NY 10007

Re: *United States of America and States of the United States,  
ex rel. Donohue v. Richard Carranza*  
USDC Case No. 1:20-cv-5396 (GHW)

Dear Hon. Judge Aaron:

This firm represents the San Diego Unified School District (“SDUSD”), as well as Cindy Marten and Dr. Lamont Jackson in their official capacities as Superintendent of SDUSD in the above-captioned case. Pursuant to your Honor’s Individual Rules of Practice for Civil Cases, we submit this letter to request a joint pre-motion conference and to join the briefing schedule proposed by Counsel for Mr. Joseph Willey for Defendants’ Motions to dismiss for the reasons stated therein. (See Doc. Nos. 123, 126, and 129)

San Diego Unified School District, Cindy Marten, and Dr. Lamont Jackson have previously requested one extension of time until April 15, 2022 to respond to plaintiff-relator’s Second Amended Complaint (Doc. 19). We hereby request to join The School Districts’ proposed briefing schedule for their anticipated motion to dismiss with Motions due by 5/27/2022, Responses due by 6/27/2022, Replies due by 7/29/2022. We are currently in the process of applying for Pro Hac Vice admission to the SDNY in order to file moving papers. By making this request, neither SDUSD, Ms. Marten, nor Dr. Jackson submit to jurisdiction or waive any arguments against jurisdiction of this Court.

Respectfully submitted,

Whitney N. Antrim  
SLS:WNA:jm

Request GRANTED. SO ORDERED.

Dated: 4/16/2022